



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

LANCE R. MILLER, DIRECTOR

CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P905-518-077

Cris Anderson, Manager
Environmental Affairs
L.E. Carpenter & Co.
1301 E. Ninth St. Suite 3600
Cleveland, OH 44114

18 DEC 1990

Dear Mr. Anderson:

Re: L.E. Carpenter Co. Supplemental Remedial Investigation Report,
Dated November 1990

The New Jersey Department of Environmental Protection (Department) has reviewed the above cited RI Report and finds it acceptable providing the comments noted below are addressed within seven (7) days of receipt of this letter.

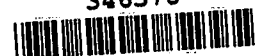
1. Section 1, Site Description

L.E. Carpenter should determine whether the two domestic and one irrigation wells are still in operation, since they might be receptors of ground water contamination.

2. Section 2, Findings...

Page 2-2, Paragraph 2 - The statement that the two monitoring wells "did not indicate the presence of VOC's from the site in the groundwater," does not explain that the VOCs, xylenes and ethylbenzene, were found in test pits (TP 83, 86, -87, -88) these near well clusters.

Also, the Department contend that the several compounds detected in MW 13S (including methylene chloride and toluene) originated from the site since these compounds were found in on-site ground water and soils. This paragraph must totally explain the situation.



3. Results

Page 3-7 and 3-8 - L.E. Carpenter must propose a plan to delineate the free product plume that has now been shown to have gone off-site.

Also, the allegation that the drainage ditch, which contains less than 1ppm VOCs, is contaminating AEC-B soils is unreasonable and must be deleted.

Page 3-35 Paragraph 3.4.2.3 - Since there are so little data on the sediment and surface water in the Rockaway River near the site, it is necessary that L.E. Carpenter re-sample SW/SS-10 for the B/N analysis that was inadvertently omitted during the remedial design phase. Also, these samples should be taken in the River, adjacent to MW-12, as was agreed on August 27, 1990.

The Department is not yet convinced that overland transport has contaminated the River. Therefore, in order to determine whether the site-related groundwater contamination is accumulating in Rockaway River sediments, a minimum of three (3) sediment samples must be taken between location SS/SW-2 and the Wharton Enterprises property, and those locations should be sampled at discrete intervals (0-6", 18-24" and 30-36"). These samples must be analyzed, at minimum, for BN+10 and VO+10.

Page 3-43 - The statement, "...VOCs do not appear to be present in soils in the vicinity of the end of the abandoned sewer line.", is incorrect and must be clarified.

Although VOC levels in the soils at the end of the abandoned sewer line (TP-89) were less than 1 ppm, the fact that trace levels of xylene and ethylbenzene were observed at this sampling point indicates that groundwater contamination has migrated to the abandoned sewer line. Further investigation is required in area AEC-B.

Please respond to these comments within seven (7) days of receipt in order that an approval of the remedial investigation may be issued. These comments are to be telefaxed to you in the interest of saving time; the response time will begin upon receipt of the telefax.

Should you have any questions you may contact me at (609) 633-1455.

Sincerely,



Edgar G. Kaup, P.E., Case Manager
Bureau of Federal Case Management

kj

c: J. Josephs, EPA II
G. Blyskun, BGWPA
J. Prendergast, BEERA
D. Henderson, WSI